UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO.: 1:CR-01-039

UNITED	STATES .	OF AMERICA,
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Plaintiff.

VS.

HARRY SABOWITZ,

Defendant.

MOTION FOR EXTENSION OF TIME OF PRESENTENCE INVESTIGATION REPORT DISCLOSURE DATE

COMES NOW the Defendant, HARRY SABOWITZ, by and through his undersigned attorney, and moves this Honorable Court for an Order granting a second extension of the Presentence Investigation Report disclosure date, and as grounds for this motion hereby submits the following:

- That, on July 26, 2007 the Defendant entered a Plea of Guilty to the Indictment.
- That, on August 13, 2007, Your Honor entered an Order granting an extension of the Presentence Investigation Report Disclosure Date to October 3, 2007.
- That, the Probation Officer, Lori Baker, has requested an additional extension of the Presentence Investigation Report disclosure date to October 24, 2007.
- That, undersigned counsel has contacted Assistant United States Attorney,
 Christy Fawcett, who voiced no objections to this motion.

WHEREFORE the Defendant, HARRY SABOWITZ, respectfully requests that this Honorable Court enter an Order extending the Presentence Investigation Report disclosure date to October 24, 2007.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished using CM/ECF this 2nd day of October, 2007 to Assistant United States Attorney, Christy Fawcett, United States Courthouse, 228 Walnut Street, 2nd Floor, P. O. Box 11754, Harrisburg, PA 17108.

JEFFREY M. VOLUCK, P.A. COUNSEL FOR DEFENDANT Wachovia Tower-Suite 700 One East Broward Boulevard Fort Lauderdale, Florida 33301 Telephone: (954) 467-8989 Email: acquit00@bellsouth.net

By: <u>/s/ Jeffrey M. Voluck</u> JEFFREY M. VOLUCK, ESQUIRE FLORIDA BAR NO.: 0113750